

August 1, 2018

Via Email and Fed Ex

Mr. Russell Fish Office of Remediation 3LC20 U.S. Environmental Protection Agency 1650 Arch Street Philadelphia, PA 19103-2029

Subject: Quarterly Progress Report

Honeywell International Inc. Delaware Valley Works

Claymont, DE

Docket No. RCRA 03-2011-0252CA

Dear Mr. Fish:

On behalf of Honeywell International Inc. (Honeywell), Wood Environment & Infrastructure Solutions, Inc. (Wood), is submitting this Quarterly Progress Report for the activities conducted by Honeywell at its Delaware Valley Works (DVW) in Claymont, Delaware. This report is being submitted in accordance with the requirements outlined in Section VI (D)(3) of the Administrative Order on Consent, Docket No. RCRA 03-2011-0252CA. This report covers the period from May 1, 2018 to August 1, 2018.

A. Identification of Site

Honeywell – Delaware Valley Works 6100 Philadelphia Pike Claymont, Delaware 19703

B. <u>Status of Work and Progress to Date</u>

- On April 18, 2016 the *DVW RCRA Facility Investigation Report, Baseline Human Health Risk Assessment*, and *Baseline Ecological Risk Assessment* were submitted to USEPA. We are awaiting USEPA's review comments on or approval of these documents.
- On November 14, 2017 Honeywell submitted a *Draft SWMU 9 Corrective Action Objectives* to USEPA for review and comment. We are awaiting USEPA's review comments on or approval of this document.

Wood Environment & Infrastructure Solutions, Inc.

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- On March 11, 2018 Honeywell submitted the *SWMU 9 Data Summary Report* to USEPA. We are awaiting USEPA's review comments on or approval of this document.
- On March 14, 2018 Honeywell and Chemtrade Solutions, Inc. submitted a letter to Russell Fish (USEPA) concerning suggesting additional data and analysis needed from the Sunoco property and Middle Creek Sluiceway, and commenting on Evergreen Resource Management's comments on EPAS request for additional data collection.
- On May 22, 2018 USEPA transmitted directions that Honeywell should prepare and submit a Phase IV RFI Work Plan to address additional RFI work recommended in the DVW RCRA Facility Investigation Report including:
 - Location and delineation of the source of groundwater impacts noted in monitoring well MW-6.
 - o Delineation of groundwater impacts migrating from Areas 5 and 6; and,
 - Assessing soil vapor intrusion within certain occupied structures on the Facility.

This Work Plan is scheduled for delivery to EPA on July 27, 2018.

On May 25, 2018 Honeywell submitted the SWMU 9 Geotech Investigation Work Plan. USEPA transmitted its review comments on this document via email dated June 15, 2018. On June 19, 2018 Honeywell provided its responses to EPA comments. On June 21, USEPA provided further comments on the document via email. On June 22, 2018 Honeywell submitted additional responses to EPA comments via email. On June 25, USEPA provided further comments on the document via email. On July 3, USEPA provided its approval of the SWMU 9 Geotech Investigation Work Plan via email.

C. <u>Difficulties Encountered During Reporting Period</u>

None during reporting period

D. <u>Actions Taken to Rectify Difficulties</u>

None during reporting period

E. <u>Activities Planned for Next Quarter</u>

- USEPA approval of the DVW RFI Report, BHHRA and BERA.
- USEPA approval of the SWMU 9 Corrective Measures Objectives matrix.
- USEPA approval of the SWMU 9 Data Summary Report.
- Honeywell submittal of the Phase IV RFI Work Plan
- Honeywell Implementation of the SWMU 9 Geotechnical Work Plan
- Submittal of the 90% Design Interim Measure Work Plan Lower Sluiceway, Shoreline and Sediment.

- Finalize submit application to DNREC for Subaqueous Lands Permit.
- Finalize and submit application for New Castle County Floodplain Permit Application.
- Finalize and submit USACE Nationwide Permit 38 application.

F. <u>Explanation of Any Non-Compliance</u>

• None this period.

G. <u>Discussion of Performance Evaluation of Remedial Measures</u>

• Not applicable.

Attached to this letter is the certification by Honeywell as required by the Administrative Order on Consent, Docket No. RCRA 03-2011-0252CA. Please contact Richard C. Karr at 610-877-6154 if you require additional information.

Sincerely,

Amec Foster Wheeler Environment & Infrastructure, Inc.

Richard C. Karr

Branch Manager/Principal Geologist

cc: Russell Fish – USEPA

Steve Coladonato – Honeywell Nelson Johnson – Arnold & Porter

Rus Davis – Honeywell

Lawrence Matson-DNREC

James Wentzel, P.E. – PADEP

CERTIFICATION

I certify that the information contained in or accompanying this Quarterly Progress Report is true, accurate, and complete.

As to the identified portion of this Quarterly Progress Report for which I cannot personally verify its accuracy, I certify under penalty of law that this Report and all attachments were prepared in accordance with procedures designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, or the immediate supervisor of such person(s), the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fines and imprisonment for knowing violations.

Signature:

Name: Steve Coladonato

Title: Remediation Manager, Honeywell International Inc.